

Ann-Martha Andrews, SBN 012616
OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
2415 East Camelback Road, Suite 800
Phoenix, Arizona 85016
Telephone: (602) 778-3700
Ann.Andrews@ogletree.com

*Attorneys for Defendant Property and Casualty
Insurance Company of Hartford*

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

PATRICIA LOMBARDO,

Plaintiff,

vs.

PROPERTY AND CASUALTY INSURANCE
COMPANY OF HARTFORD; ALE
SOLUTIONS, INC; DOES I-1 and ROES 1-5,

Defendant.

No. 2:17-CV-02242-JCM-PAL

**MOTION TO EXTEND EXPERT
DEADLINES**

Defendant Property and Casualty Insurance Company of Hartford (“Hartford”) moves to extend the deadline for expert disclosures, and for expert discovery, by 60 days. The plaintiff’s counsel’s withdrawal created some uncertainty for Hartford as to the status of discovery. The extension will extend the deadline past the plaintiff’s deadline to retain counsel (which has been extended to May 21, 2018, 96 days after her counsel withdrew). Hartford requests the deadlines be set as follows:

Expert Disclosures – June 29, 2018

Rebuttal Disclosures – July 30, 2018

Deadline for Expert Discovery – September 14, 2018

RESPECTFULLY SUBMITTED this 10th day of April, 2018.


OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

By: s/ Ann-Martha Andrews
Ann-Martha Andrews
2415 East Camelback Road, Suite 800
Phoenix, Arizona 85016
Telephone: (602) 778-3700
Email: ann.andrews@ogletreedeakins.com

*Attorneys for Defendant Property and
Casualty Insurance Company of Hartford*

IT IS ORDERED that the Motion to Extend Deadlines (ECF No. 22) is **GRANTED**.

Dated: April 19, 2018


Peggy A. Leen
United States Magistrate Judge

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of April, 2018, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF Systems for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrant:

Patricia Lombardo
3335 Tiara Point Circle
Las Vegas, NV 89146

s/ Diane M. Kelly
Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

33672031.2

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.
2415 EAST CAMELBACK ROAD, SUITE 800
PHOENIX, ARIZONA 85016
(602) 778-3700